IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In Re: **FERDINAND GARCIA RODRIGUEZ** XXX-XX-7400 Debtor(s)	Case No.: 13-06816(ESL) Chapter 13

TRUSTEE'S MOTION TO INCREASE BASE POST CONFIRMATION PURSUANT TO SECTION 1329(a) AND F. R. BANK P. 3015(g) OF THE BANKRUPTCY CODE

TO THE HONORABLE COURT:

NOW COMES José R. Carrión, Chapter 13 Trustee, through the undersigned counsel and very respectfully states and prays as follow:

1. Plan dated **November 18, 2013**(docket no.20) with a base of $**9,000.00** was confirmed/approved.

2. The Chapter 13 Trustee has standing to request the modification of the confirmed, pursuant to section 1329(a) of the Bankruptcy Code, section 3015(g) of the F. R. Bank. P. and Section 1302 of the Bankruptcy Code.

3. On November 18, 2013, Debtor filed a Plan dated November 18, 2013. Docket No.20) with a total base of $9,000.00

4. On January 10, 2014, the **Trustee received from Debtor a payment in the amount of $275.00.** This sum comes from

1-A refund received by debtor from the Local Department of Treasury and or Internal revenue Services (IRS)

2-The excess of sick leave and vacation pay

5. In light of the aforesaid, the Chapter 13 Trustee herewith requests a modification of the confirmed plan as follows: **(no new plan will be filed)**

a. **The base of the plan is increased to $9,275.00.** The base of the Plan has increased since the Trustee received a lump sum payment in the amount of **$275.00.**

6. All other provision included in the hereby modified plan will remain in effect.

7. The plan meets all requirements of 11 USC §1322(a), 1322(b), 1323(c), 1325(a) and 1329 (a).

WHEREFORE the Trustee respectfully requests that this Honorable Court grant this motion and confirm this Motion Post-Confirmation Modification Plan to increase the base of the plan to **$0.00**, pursuant to 11 U.S.C. §1329.

21 DAYS NOTICE: In accordance with Bankruptcy Rule 2002(a)(5) and Local Rule 3015-2(f)(2)(A), the Debtor(s), all Creditors and Parties in Interest in this case, are hereby notified that unless an opposition to this proposed modified plan is submitted in writing within **21** days from the date appearing in the certificate of service, infra, the Court may grant this motion and confirm the modified plan without the need of an actual hearing.

CERTIFICATE OF SERVICE: Pursuant to Bankruptcy Rule 2002 The Chapter 13 Trustee herewith certified that a copy of this motion has been served on the **same date it is filed to:** the DEBTOR(s), her/his/their attorney, and to all Creditors and to all Parties in Interest, by first class mail, if not a ECFS register user, to the address of record.

In San Juan, Puerto Rico this **16th** day of July 2015.

/S/ JOSE R CARRION
JOSE R. CARRIÓN-MORALES
CHAPTER 13 TRUSTEE
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